

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Christopher Watson and Plaintiff,  
Intellectus, LLC,

11 cv 0874 (PC)

- against -

Riptide Worldwide, Inc. et Defendant.  
al.

MOTION TO ADMIT COUNSEL

PRO HAC VICE

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the  
Southern and Eastern Districts of New York, I, Megan J. Muoio a member in good standing of  
the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

Applicant's Name: Anthony F. Vittoria  
Firm Name: Ober Kaler  
Address: 100 Light Street  
City/State/Zip: Baltimore, Maryland 21202  
Phone Number: (410) 685-1120  
Fax Number: (410) 547-0699

Anthony F. Vittoria is a member in good standing of the Bar of the States of  
Maryland, Virginia and the District of Columbia

There are no pending disciplinary proceeding against Anthony F. Vittoria  
in any State or Federal court.

Dated: 4/21/2011

City, State: New York, New York

Respectfully submitted,

Sponsor's

SDNY Bar JM-6121

Firm Name: Allyn & Fortuna LLP

Address: 200 Madison Avenue, 5th Floor

City/State/Zip: New York, NY 10016

Phone Number: (212) 213-8844

Fax Number: (212) 213-3318

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

	X
CHRISTOPHER WATSON and	:
INTELLECTUS, LLC,	:
Plaintiffs,	:
-against-	:
RIPTIDE WORLDWIDE, INC. (f/k/a Shea	:
Development Corp.), FRANCIS E. WILDE,	:
TOMMY E. WHEELER, JOSEPH VITETTA,	:
RICHARD CONNELLY and PHILIP E.	:
LOEFFEL,	:
Defendants.	:
	X

State of New York )  
                     ) ss:  
County of New York )

MEGAN J. MUOIO, being duly sworn, hereby deposes and says as follows:

1. I am associated with Allyn & Fortuna, LLP, counsel for Plaintiffs Christopher Watson and Intellectus, LLC in the above captioned action. I am familiar with the proceedings in this case. I make this Affidavit based on my personal knowledge of the facts set forth herein and in support of Plaintiffs' motion to admit Anthony F. Vittoria as counsel *pro hac vice* to represent Plaintiffs in this matter.

2. I am a member of good standing of the bar of the State of New York, and was admitted to practice law on January 26, 2005. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have known Anthony F. Vittoria since December 2010.

4. Mr. Vittoria is a principal of Ober Kaler in Baltimore, Maryland. He is a member in good standing of the Bar of the States of Maryland, Virginia and the District of Columbia. Mr. Vittoria's Certificates of Good Standing from Maryland, Virginia and the District of Columbia are annexed hereto as Exhibit A.

5. I have found Mr. Vittoria to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

11-CV-0874 (PAC)

**AFFIDAVIT OF MEGAN  
J. MUOIO IN SUPPORT OF  
MOTION TO ADMIT  
COUNSEL PRO HAC VICE**

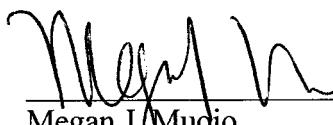
6. Accordingly, I am pleased to move the admission of Anthony F. Vittoria, *pro hac vice*.

7. I respectfully submit a proposed order granting the admission of Anthony F. Vittoria, *pro hac vice*, which is attached hereto as Exhibit B.

WHEREFORE, it is respectfully requested that the motion to admit Anthony F. Vittoria, *pro hac vice*, to represent the Plaintiffs in the above captioned matter, be granted.

Dated: April 20, 2011  
New York, New York

Respectfully submitted,



Megan J. Mudio  
SNDY Bar Code: JM-6121

Sworn To Before Me This  
20<sup>th</sup> day of April, 2011

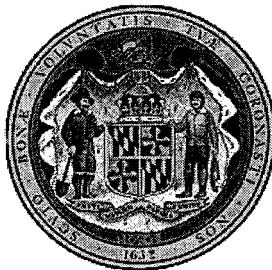


Notary Public

ANDREA PLATNER HELLMAN  
Notary Public, State of New York  
No. 02HE5068712  
Qualified in New York County  
Commission Expires Nov. 4, 2014

12/28/14

**Court of Appeals  
of Maryland  
Annapolis, MD**



***CERTIFICATE OF GOOD STANDING***

*STATE OF MARYLAND, ss:*

*I, Bessie M. Decker, Clerk of the Court of Appeals of Maryland,  
do hereby certify that on the eighteenth day of December, 1997,*

***Anthony Francis Vittoria***

*having first taken and subscribed the oath prescribed by the Constitution and  
Laws of this State, was admitted as an attorney of said Court, is now in good  
standing, and as such is entitled to practice law in any of the Courts of said  
State, subject to the Rules of Court.*

*In Testimony Whereof, I have hereunto  
set my hand as Clerk, and affixed the Seal  
of the Court of Appeals of Maryland, this  
twelfth day of April, 2011.*

*Bessie M. Decker*

*Clerk of the Court of Appeals of Maryland*

# VIRGINIA STATE BAR



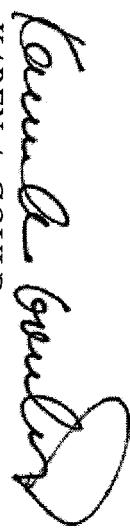
## CERTIFICATE OF GOOD STANDING

THIS IS TO CERTIFY THAT ANTHONY FRANCIS VITTORIA IS AN ACTIVE MEMBER OF THE VIRGINIA STATE

BAR IN GOOD STANDING. MR. VITTORIA WAS LICENSED TO PRACTICE LAW IN VIRGINIA ON APRIL 23, 1997,

AFTER SUCCESSFULLY PASSING THE BAR EXAMINATION GIVEN BY THE VIRGINIA BOARD OF BAR EXAMINERS.

*Issued April 11, 2011*

  
KAREN A. GOULD  
EXECUTIVE DIRECTOR AND  
CHIEF OPERATING OFFICER



District of Columbia Court of Appeals

Committee on Admissions

430 E Street, N.W. — Room 123  
Washington, D.C. 20001  
202 / 879-2710

I, JULIO A. CASTILLO, Clerk of the District of Columbia  
Court of Appeals, do hereby certify that

ANTHONY F. VITTORIA

was on the 7<sup>TH</sup> day of DECEMBER, 1998

duly qualified and admitted as an attorney and counselor and  
entitled to practice before this Court and is, on the date  
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have  
hereunto subscribed my name  
and affixed the seal of this  
Court at the City of  
Washington, D.C., on April  
14, 2011.

JULIO A. CASTILLO  
Clerk of the Court

By: J. A. Castillo  
Deputy Clerk

**UNITED STATES DISTRICT COURT**

**SOUTHERN DISTRICT OF NEW YORK**

Christopher Watson and  
Intellectus, LLC,

Plaintiff,

11 cv 0874 (PAC)

- against -

Riptide Worldwide, Inc. et al.

Defendant.

**ORDER FOR ADMISSION  
PRO HAC VICE  
ON WRITTEN MOTION**

Upon the motion of Megan J. Muoio attorney for Christopher Watson and Intellectus, LLC and said sponsor attorney's affidavit in support;

**IT IS HEREBY ORDERED** that

Applicant's Name: Anthony F. Vittoria  
Firm Name: Ober Kaler  
Address: 100 Light Street  
City/State/Zip: Baltimore, Maryland 21202  
Telephone/Fax: (410) 685-1120  
Email Address: 410-547-0699

is admitted to practice pro hac vice as counsel for Christopher Watson and Intellectus, LL in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated:  
City, State:

\_\_\_\_\_  
United States District/Magistrate Judge



**AFFIDAVIT OF SERVICE**

STATE OF NEW YORK )  
: SS :  
COUNTY OF NEW YORK )

Anna Roman, being duly sworn, deposes and says:

On April 20, 2011, I served the annexed **MOTION TO ADMIT ANTHONY F. VITTORIA PRO HAC VICE** on the attorney(s) and/or parties named below by depositing a true copy in a postage-paid, properly addressed envelope into the care of the United States Postal Service at the postal box located at 200 Madison Avenue, New York, New York 10016. Postal service directed as follows:

Teresa M. Cinnamond, Esq.  
Carroll, McNulty & Kull LLC  
120 Mountain View Boulevard  
Post Office Box 650  
Basking Ridge, NJ 07920

Francis E. Wilde  
316 Ridgehaven Place  
Richardson, TX 75080

Riptide Worldwide Inc.  
c/o Shea Development Corp  
1859 Whitney Mesa Drive  
Henderson, NV 89014

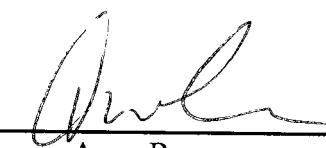
Rick Castello, Esq.  
Shaub, Ahmety, Citrin & Spratt, LLP  
655 Third Avenue  
New York, NY 10017

Tommy E. Wheeler  
13846 Atlantic Blvd, #404  
Jacksonville, FL 32225

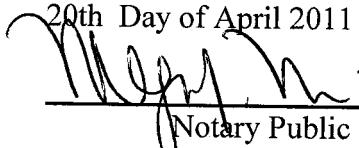
Joseph E. Vitetta, Jr.  
260 Ambleside Chase  
Alpharetta, GA 30022

Such being the address previously designated for that purpose in the preceding papers in this action. Such service was done in full compliance with Rule FRCP 5(b). I am over 18 years old.

Dated: New York, New York  
April 20, 2011

  
\_\_\_\_\_  
Anna Roman

Sworn To Before Me This  
20th Day of April 2011

  
Notary Public

